Scott M. Matheson, Governor Temple A. Reynolds, Executive Director Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

August 5, 1982

Mr. Brian Buck Environmental Coordinator Getty Oil Company P.O. Box 7900 Salt Lake City, Utah 84107

RE: Mercur Canyon Project Modification ACT/045/<del>013</del>

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Dear Brian:

The Division has finalized comments in the review of the proposed expansion of the Mercur Canyon Project. Please review the following suggestions and questions and respond at your earliest convenience so that the Division may be able to finalize approval.

As indicated in the applicant's March 22, 1982 letter, the anticipated total disturbance has increased from 272 acres to 475 acres. However, the acreage alloted for topsoil stockpiles has not increased. Will additional space to accomodate salvageable topsoil be required or does the applicant plan to increase the depth of storage at the current stockpiles thus confining the storage to the original acreage? Please indicate which of these options will be pursued. If additional acreage is required, how much area will be affected and where will it be located? If depth will be increased:

- 1. What is the anticipated final depth?
- 2. What will be the slope of the stockpile?
- 3. How will stability be assured?
- 4. Will terraces be employed?
- 5. The applicant should provide topsoil stockpile configurations and cross sections.

The applicant indicates that three topsoil stockpile areas exist. Which of these are currently in use? Once a stockpile is established and protected and revegetated, it is usually not desirable to disturb it prior to its redistribution. Given the sequence of activities associated with the disturbance attendant to the proposed expansion, how will stockpiling activities be correlated to stockpile locations to minimize the disturbance of existing, protected topsoil stockpiles?

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Also, an estimate of the volume of soil stated for redistribution is necessary for those areas indicated in the approved plan under the Reclamation Schedule (Abandonment). Information should be provided regarding anticipated expansion of acreage and depths of intended replacement for each area. What is the current volume of topsoil available after soil has been salvaged from the areas associated with the revised estimates for acreage disturbed? Given the projected acreage for reclamation and the anticipated volume of storage, will there be adequate soil available to conduct reclamation plans? In the event of a topsoil deficit, from where will deficit soil materials be obtained?

The location of the two groundwater monitor wells will be sufficient to determine whether toxicity levels due to seepage are occurring in the groundwater. Data results should be provided to the Division of Oil, Gas and Mining (DOGM).

The design installation and maintenance procedure for the clay liner as approved by the Bureau of Water Pollution Control, should be submitted to the DOGM to provide the assurance that groundwater is adequately protected from potential seepage.

The DOGM concurs with the use of existing sedimentation structures and the pit for treatment of disturbed area runoff. The applicant should submit to the Division a sound runoff control plan as discussed in the Getty letter of May 21, 1982.

Please be advised that the Board of Oil, Gas and Mining is still in the process of considering approaches to personal guarantees. They will be approached again on the subject of extending Getty's original surety estimate to the figure previously discussed.

If you have questions, please contact Tom Tetting of my staff.

Sincerely,

JAMES W. SMITH, JR.

COORDINATOR OF MINED LAND DEVELOPMENT

JWS/tnt/tck

cc: Tom Portle Sally Kefer Tom Tetting